

Interagency Forest Practices Audit 2016 Work Plan



**State of Idaho
Department of Environmental Quality
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Executive Summary

In summer 2016, the Idaho Department of Environmental Quality (DEQ), with assistance from the Idaho Department of Lands (IDL), will audit 64 timber sales throughout Idaho. The audits will evaluate compliance with the Idaho Forest Practices Act and are a required part of the *Idaho Nonpoint Source Management Plan*. The final report will be completed by December 2016.

This work plan provides the project rationale, sampling schedule, and audit site locations.

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Regulatory Background

The Idaho Department of Environmental Quality (DEQ) is delegated authority for control of water pollution under the Clean Water Act; the Idaho Environmental Protection and Health Act of 1972 (Title 39, Chapter 1, Idaho Code); the Idaho Water Quality Act (Title 39, Chapter 36, Idaho Code); and the Water Quality Standards (IDAPA 58.01.02).

DEQ is the lead state agency for protecting beneficial uses and the level of water quality needed to sustain them. In addition, DEQ is the lead state agency for ensuring that high quality waters are maintained. DEQ is also the lead designated management agency for implementing Clean Water Act §319.

Silvicultural activities in Idaho are regulated by the Forest Practices Act (FPA) (IDAPA 20.02.01). The act applies to private, state, and federal timberlands and implements the goals and objectives of the *Idaho Nonpoint Source Management Plan* (DEQ 2015).

The Idaho Department of Lands (IDL) is responsible for implementing the Forest Practices Act and ensuring compliance with its management prescriptions. DEQ is responsible for ensuring the act provides adequate protection to surface water. To this end, DEQ conducts audits of the state's timber harvests every 4 years.

In 2013, DEQ and IDL renewed a memorandum of understanding (MOU) with the US Forest Service and US Bureau of Land Management. In the MOU, the agencies agreed to work together to conduct the quadrennial audit of timber sales in the state (DEQ 2013). DEQ committed to coordinate and chair the statewide audit every fourth year.

The audit checks compliance with FPA rules and examines active and recently completed harvesting operations across the state on federal, state, and private ownerships. Landowners, forestry operators, and other interested parties, including the public, are invited to participate in these audits. Participation is at the discretion of the landowner and must be arranged in advance.

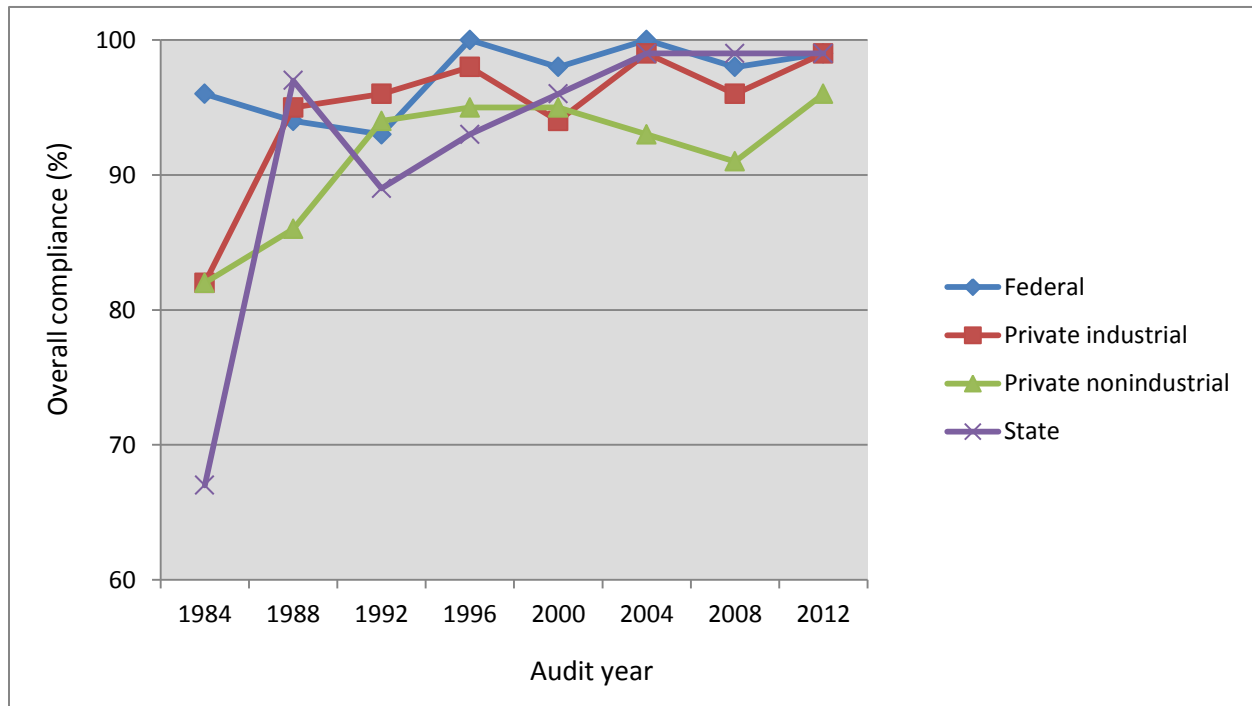
In accordance with the federal Clean Water Act, DEQ administers Idaho's water quality standards as well as the *Idaho Nonpoint Source Management Plan* (DEQ 2015). The corresponding nonpoint source silvicultural best management practices are also monitored by DEQ in the quadrennial audit.

The MOU requires DEQ to suggest—and IDL to evaluate—modifications to FPA rules that do not appear to be providing adequate protection of water quality. Following the audits, DEQ makes recommendations to the Forest Practices Act Advisory Committee and IDL. These recommendations, which may include administrative rule changes or additions, are then moved toward corresponding rule promulgation following extensive reviews and analyses. These recommendations ensure that Idaho's BMPs and rules are based on the best available science.

History

Audits have been conducted every 4 years since 1984. The 2008 and 2012 audits were also used to develop a new riparian harvest rule (the "Shade Rule" IDAPA 20.02.01.030.07.e). The audits

have demonstrated an increasing degree of compliance with the FPA, as shown in the figure below. The 2012 audit reflected all-time high rates of rule compliance. The overall rate of observed rule compliance for the federal, private industrial, and state audited sites was 99%. The overall rate of rule compliance on the nonindustrial private audited sites was 96%.



Purpose of this Work Plan

This work plan provides a brief overview of the audit process, field plan for 2016, and objectives for the audits. It is the primary communication vehicle to explain the chosen audit sites. It also provides a calendar so interested parties can observe the audits. Finally, it explains the pilot projects that are being undertaken.

Further information can be obtained from the quality assurance project plan (DEQ 2016).

2016 Goals

The goals of the 2016 audits are as follows:

1. Assess the extent to which FPA rules are being followed in each ownership category.
2. Compare these results with previous audits.
3. Determine whether FPA rules are effective in protecting stream habitat.
4. Recommend rule and administrative procedure revisions, if indicated by the audit findings.

The audit's compliance component will be conducted as a statewide assessment of whether the FPA rules (IDAPA 20.02.01) are being implemented and maintained. Therefore, although the audit is comprised of individual timber sales, our recommendations will be statewide in scope.

To allow comparison with previous audits, many things have been kept constant, including the following:

- Approximately the same number of primary audit sites
- Same division between ownership types
- Same field audit partnership between DEQ and IDL

Although the staff members conducting the 2016 audit have changed, the previous auditors from both agencies are involved in an advisory capacity.

Improvements

The quadrennial audit is an ongoing, constantly improving process. The following changes have been made for the 2016 audits:

1. In addition to the 44 primary sites, 20 sites from the previous audit cycle will be revisited, which will allow for the following:
 - a. An assessment of the medium-term effectiveness of the FPA rules.
Historically, sites have been visited within 2 years of harvest. These additional sites will provide an opportunity to see sites up to 6 years after harvest.
 - b. Inclusion of replanting rules (IDAPA 020.02.01.050). These rules typically have a 5-year compliance period and so have not been included in previous audits.
2. The audit site panel will be comprised of *all* timber sales that meet the criteria of size and proximity to water. Previously, only inspected sales were used.
3. Electronic field forms will be used to collect the audit data. Paper forms will be available as a backup.

Sample Site Selection

The pool of potential audit sites is all timber sales in Idaho that meet the following criteria:

1. Must contain a total cutting area of at least 5 acres.
2. Must contain a minimum of 500 feet of Class I (fish-bearing) stream within or bordering its cutting units.
3. Forest practice activities must have occurred since January 2014. Active timber sales are included in the audit panel.

DEQ collected information on federal timber sales. IDL collected information on state and private timber sales. The DEQ and IDL sites were combined into one list. From this list, the actual audit sites were chosen by DEQ.

Types of Sites—Stratifiers

Sites were randomly chosen considering the following factors:

- Each region of the state (north, south-west, and east) should feature at least one site.
- Each IDL supervisory area (10 total) should feature at least one site.
- The initial 44 sites should be divided evenly between each ownership type: 11 federal, 11 state, 11 private industrial, and 11 private nonindustrial.

Once these factors are satisfied, sites were selected from a list, ordered randomly using a computer script.

Several backup sites were also identified in case several of the initial sites were inaccessible.

Actual Sites Chosen

The following sites have been chosen for auditing in the 2016 cycle:

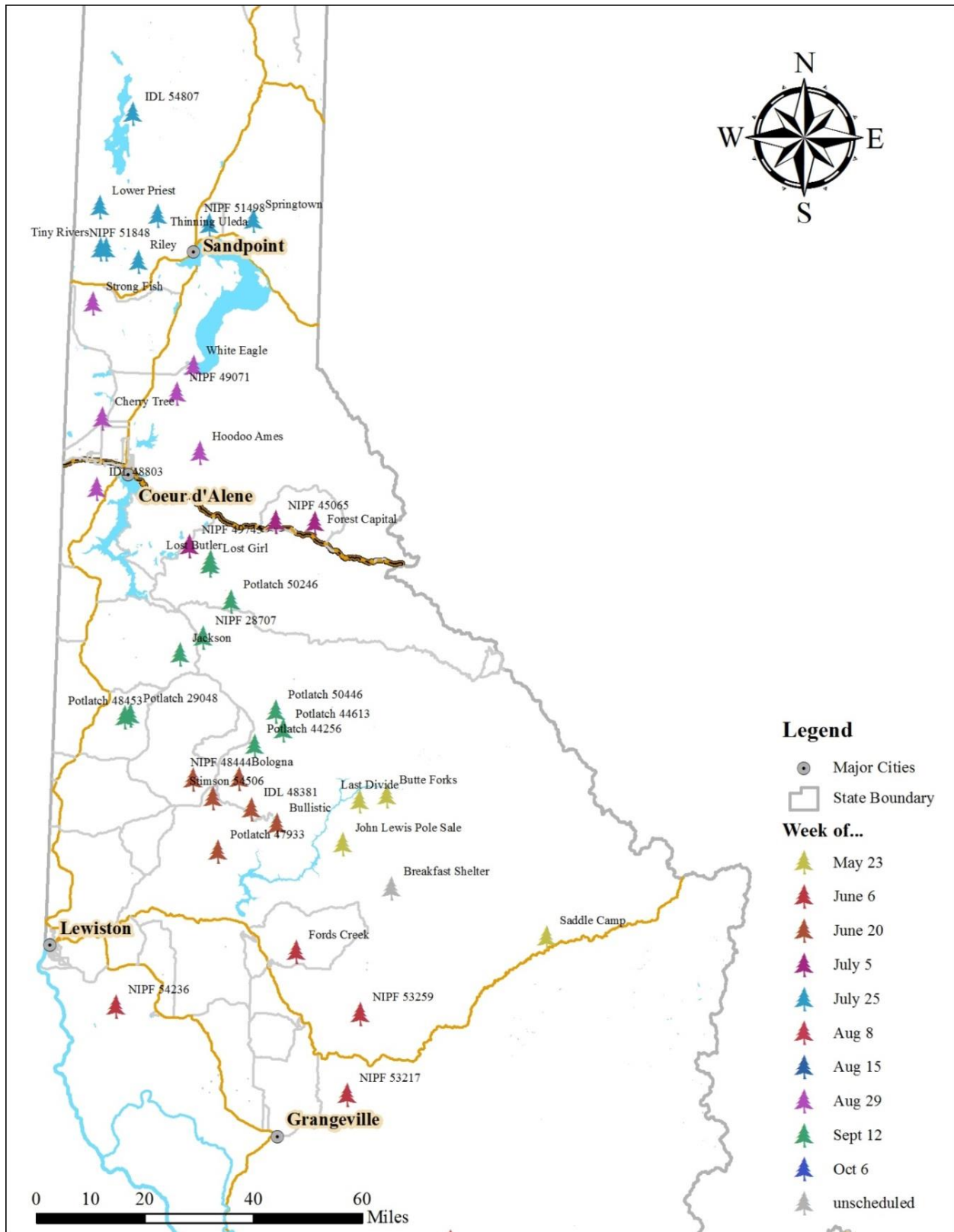
Sale Name	Notification #	Owner Type	Administrative Area
Half Hazard Fire Salvage	None	Federal	BLM Coeur d'Alene
West Camas	None	Federal	Boise BLM
Pinney Slope	None	Federal	Boise NF
Frontier	None	Federal	Boise NF
Lucky Salvage	None	Federal	Boise NF
Stolle Seven Salvage	None	Federal	Boise NF
Smith Canyon	None	Federal	Caribou-Targhee NF
Twin Creek	None	Federal	Caribou-Targhee NF
Williams Bear	None	Federal	Caribou-Targhee NF
Breakfast Shelter	50041	State	Clearwater
Last Divide	50006-C	State	Clearwater
Butte Forks	47901C	IPF	Clearwater
NIPF 29860 (Wilson)	29860F	NIPF	Eastern Idaho
NIPF 53259 (Baker)	53259C	NIPF	Maggie Creek
NIPF 53217 (Teats)	53217C	NIPF	Maggie Creek
NIPF 54236 (Knaub)	54236C	NIPF	Maggie Creek
Fords Creek	48003C	IPF	Maggie Creek
IDL 48803	48803C	State	Mica
NIPF 49745 (Kienke)	49745C	NIPF	Mica
NIPF 49071 (Burdette)	49071C	NIPF	Mica
Cherry Tree	49029C	IPF	Mica
White Eagle	48827C	State	Mica
Forest Capital 28420	28420F	IPF	Mica
NIPF 45065 (McKinney)	45064C	NIPF	Mica
Lost Girl	Unknown	State	Mica
Lost Butler	49013C	State	Mica
Moonshine	None	Federal	Nez Perce-Clearwater NF

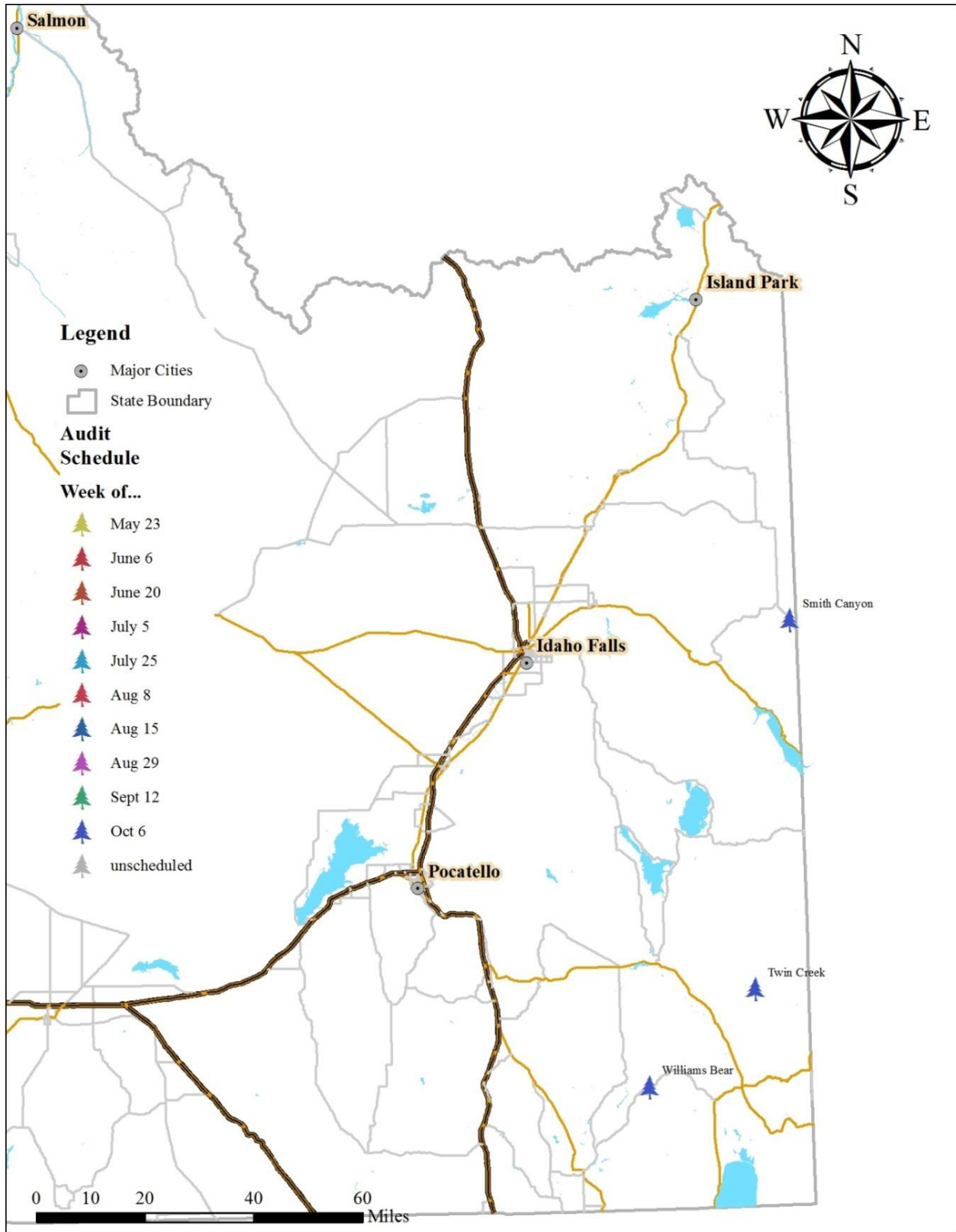
Sale Name	Notification #	Owner Type	Administrative Area
Quagmire	None	Federal	Nez Perce-Clearwater NF
Saddle Camp	None	Federal	Nez Perce-Clearwater NF
Hoodoo Ames	None	Federal	Panhandle NF
Lower Priest	None	Federal	Panhandle NF
Potlatch 35558	35558D	IPF	Payette Lakes
NIPF 35580 (Conner)	35580D	NIPF	Payette Lakes
Rubicon	None	Federal	Payette NF
Tiny Rivers	51577C	NIPF	Pend Oreille Lake
Riley	51822C	State	Pend Oreille Lake
NIPF 51848 (Roberts)	51848C	NIPF	Pend Oreille Lake
NIPF 51498 (Eich)	51498C	NIPF	Pend Oreille Lake
Strong Fish	48876C	IPF	Pend Oreille Lake
Springtown	51430C	State	Pend Oreille Lake
Potlatch 47933	47933C	IPF	Ponderosa
IDL 48381	48381C	State	Ponderosa
NIPF 48444 (Ownbey)	48444C	NIPF	Ponderosa
Potlatch 48453	48453C	IPF	Ponderosa
Bologna	47980C	IPF	Ponderosa
Stimson 54506	54506C	IPF	Ponderosa
Bullistic	48380c	State	Ponderosa
Potlatch 29048	29048F	IPF	Ponderosa
IDL 54807	54807C	State	Priest Lake
Thinning Uleda	Unknown	State	Priest Lake
Cannonball	None	Federal	Sawtooth NF
Trap Creek Salvage	None	Federal	Sawtooth NF
Upper SF Boise	None	Federal	Sawtooth NF
NIPF 49537 (Brasher)	49537C	NIPF	Southwest
Turkey Track	49533c	State	Southwest
East Dry Buck	Unknown	State	Southwest
NIPF 28028 (Baumhoff)	28028F	NIPF	Southwest
Potlatch 50246	50246C	IPF	St. Joe
Potlatch 50446	50446C	IPF	St. Joe
Jackson	50568C	IPF	St. Joe
NIPF 28707 (Hirsch)	28707F	NIPF	St. Joe
Potlatch 44256	44256C	IPF	St. Joe
Potlatch 44613	44613C	IPF	St. Joe

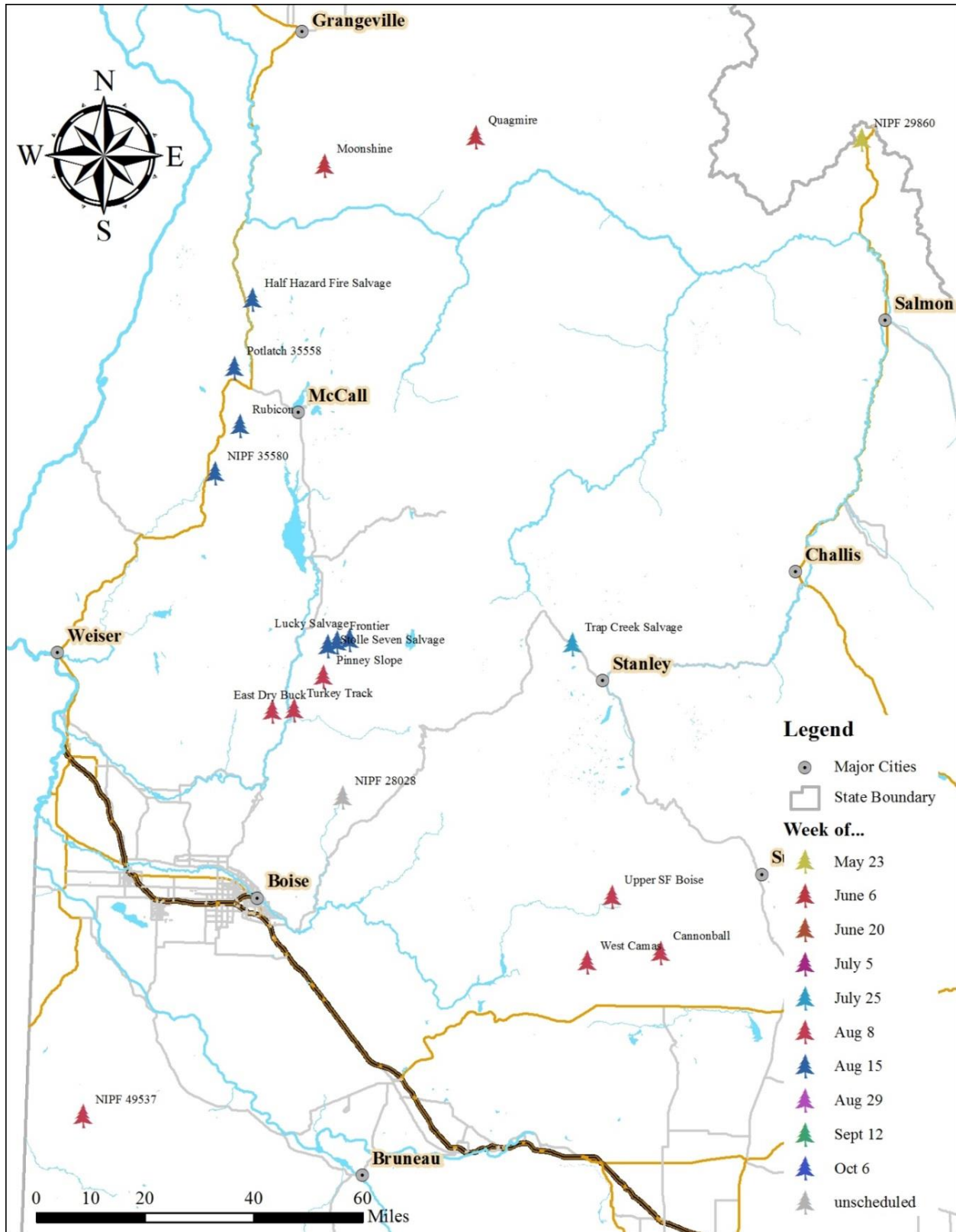
Note: NF = national forest, IPF = industrial private forest, NIPF = nonindustrial private forest.

Map

An interactive map of the audit sites is available on DEQ's website (www.deq.idaho.gov/forest-practices-audits). The following maps show the planned audit sites in each region of the state.







Tentative Calendar

This monitoring calendar is published to aid interagency participation with the audits. We welcome any interested party to observe the audit, with the permission of the landowner. The most up-to-date version of the calendar will be available on the DEQ website. The dates are firm but are subject to change in response to unpredictable events such as fires and road closures. Please contact DEQ or IDL to arrange a site visit date.

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
May 23 NIPF 29860 <i>Salmon area</i>	May 24 Saddle Camp <i>Powell area</i>	May 25 NIPF 53217 NIPF 53259 <i>Kooskia area</i>	May 26 Quagmire <i>Kooskia area</i>	May 27 Fords Creek <i>Kooskia area</i>
May 30	May 31	June 1	June 2	June 3
June 6 NIPF 54236 <i>Kooskia area</i>	June 7 Moonshine <i>Kooskia area</i>	June 8 Butte Forks <i>Pierce area</i>	June 9 Last Divide <i>Pierce area</i>	June 10 Breakfast Shelter <i>Pierce area</i>
June 13	June 14	June 15	June 16	June 17
June 20 Bologna <i>Bovill area</i>	June 21 Potlatch 47933 <i>Bovill area</i>	June 22 Bullistic <i>Bovill area</i>	June 23 Stimson 54506 NIPF 48444 <i>Bovill area</i>	June 24 IDL 48381 <i>Bovill area</i>
June 27	June 28	June 29	June 30	July 1
July 4	July 5 Forest Capital McKinney <i>Smelterville area</i>	July 6	July 7	July 8 NIPF 49745 <i>Coeur d'Alene area</i>
July 11	July 12	July 13	July 14	July 15
July 18	July 19	July 20 Trap Creek <i>Stanley area</i>	July 21	July 22
July 25 Lower Priest <i>Priest Lake area</i>	July 26 IDL 54807 <i>Priest Lake area</i>	July 27 Tiny Rivers NIPF 51848 <i>Priest Lake area</i>	July 28 Springtown NIPF51498 <i>Sandpoint area</i>	July 29 Riley <i>Sandpoint area</i>
Aug. 1	Aug. 2	Aug. 3	Aug. 4	Aug. 5

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
Aug. 8 NIPF 49537 <i>Silver City area</i>	Aug. 9 Turkey Track EF Dry Buck <i>Banks area</i>	Aug. 10 Pinney Slope <i>Crouch area</i>	Aug. 11 West Camas <i>Fairfield area</i>	Aug. 12 Cannonball Upper SF Boise <i>Fairfield area</i>
Aug. 15 Half Hazard <i>New Meadows area</i>	Aug. 16 Rubicon <i>New Meadows area</i>	Aug. 17 Potlatch 35558 NIPF 35580 <i>New Meadows area</i>	Aug. 18 Stolle Seven, Frontier, Lucky Salvage <i>Warm Lake area</i>	Aug. 19
Aug. 22	Aug. 23	Aug. 24	Aug. 25	Aug. 26
Aug. 29 IDL 48803 <i>Coeur d'Alene area</i> <i>-will be rescheduled</i>	Aug. 30 Hoodoo Ames <i>Coeur d'Alene area</i> <i>-will be rescheduled</i>	Aug. 31 Strong Fish <i>Coeur d'Alene area</i> <i>-will be rescheduled</i>	Sept. 1 NIPF 49071 White Eagle <i>Athol area</i> <i>-will be rescheduled</i>	Sept. 2 Cherry Tree <i>Coeur d'Alene area</i> <i>-will be rescheduled</i>
Sept. 5	Sept. 6	Sept. 7	Sept. 8	Sept. 9
Sept. 12 Potlatch 50246 <i>Saint Maries area</i>	Sept. 13 Lost Butler Lost Girl <i>Saint Maries area</i>	Sept. 14 Jackson NIPF 28707 <i>Saint Maries area</i>	Sept. 15 Potlatch 44613, 50446, and 44256 <i>Bovill area</i>	Sept. 16 Potlatch 48453 Potlatch 29048 <i>Potlatch area</i>
Sept. 19	Sept. 20	Sept. 21	Sept. 22	Sept. 23
Sept. 26	Sept. 27	Sept. 28	Sept. 29	Sept. 30
Oct 3	Oct 4	Oct 5	Oct 6 Williams Bear Twin Creek <i>Soda Springs area</i>	Oct 7 Smith Canyon <i>Victor area</i>

Methods

The audits will assess compliance with every applicable FPA rule at each site. The audit team will walk all roads and examine all stream crossings within each sale. If the sale includes multiple cutting units, each unit will be examined.

For each FPA rule, a rating of complied or not complied will be assigned. Comments about the effectiveness of the rule or management practices will be included and used to recommend future improvements.

Reports

DEQ is responsible for writing the final audit report. It will be published by December 31, 2016. The report will identify the compliance rate for each class of timber sale. It will not identify individual timber sales.

Pilot Projects

The quadrennial audit is often paired with a pilot project. In 2008 and 2012, the project involved collecting data for the new shade rule. In 2016, IDL is evaluating the operational implementation of the shade rule. This study will be conducted in parallel with the audit, but separate from it. IDL is responsible for coordinating the extra crewmembers and monitoring required.

As recommended in the 2012 audit, a separate study in collaboration with the University of Idaho will be testing the new shade rule at several controlled sites.

For the first time, data will be collected electronically, using handheld computers. Paper field forms will be used in case of equipment failure.

QA/QC

The quality assurance project plan is available from DEQ (DEQ 2016). Cara Hastings of DEQ is the quality assurance officer and will conduct one or more site visits to ensure the audits are accurate and repeatable.

Safety

DEQ and IDL assign top priority to the safety of their audit crew.

All work performed by DEQ personnel will be conducted in accordance with the *Idaho General Safety and Health Standards* (Division of Building Safety 2006).

Furthermore, the audit team will:

1. Be certified in first aid and CPR.
2. Carry appropriate first aid kits, fire extinguishers, and emergency contact tools such as radios, locator beacons or satellite telephones.
3. Be experienced working around water.
4. Be provided appropriate tools and safety equipment
5. Wear hard hats and safety vests if auditing an active harvest operation.
6. Wear sturdy footwear.

References

- DEQ (Idaho Department of Environmental Quality). 2015. Idaho Nonpoint Source Management Plan. Boise, ID: DEQ. Available at www.deq.idaho.gov/water-quality/surface-water/nonpoint-source-pollution/idahos-nps-management-program.
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